VIRGINIA:

IN THE CIRCUIT COURT OF PRINCE WILLIAM COUNTY

ALISHA WILSON WILKES	;)	
)	
Plaintiff	5)	
)	
v.)	CL 85687
)	
FIRST CLASS SETTLEMEN	NT, LLC, et. al.,)	
no de autoritativo de la Porte America America y Alemano de America de America de America de America de America **)	
Defenda	ints.)	

DEFENDANTS GMAC MORTGAGE, LLC'S AND HOMECOMINGS FINANCIAL, LLC'S ANSWERS TO PLAINTIFF'S SECOND SET OF INTERROGATORIES

COME NOW Defendants GMAC Mortgage, LLC ("GMAC") and Homecomings

Financial, LLC ("Homecomings") and state the following in response to the Interrogatories served by Plaintiff:

General Objections Applicable to All Interrogatories:

GMAC and Homecomings object to the Definitions and Instructions set forth in the Second Set of Interrogatories to the extent they are inconsistent with or beyond the scope of the requirements of Part Four of the Rules of the Supreme Court of Virginia.

GMAC and Homecomings object to the Second Set of Interrogatories to the extent the number of interrogatories propounded by Plaintiff now exceeds the limitation set forth in Rule 4:8(g) of the Rules of the Supreme Court of Virginia.

Notice Regarding Responses:

Interrogatories requesting information pertaining to the Answer to the 2nd Amended Complaint or the defenses raised in such Answer involve legal information and/or legal conclusions, and the responses to these particular interrogatories were therefore prepared by or with the assistance of counsel of record.

22. Please list the addresses in which you mailed correspondence and/or bills to Mr. Wilkes and/or Ms. Wilkes concerning the promissory note or the Sixth Deed of Trust. Please identify the specific time periods that you mailed such correspondence and/or bills to such addresses. Please identify any persons that have knowledge of the same.

Answer

Alisha Wilkes Alisha Wilkes Scott A. Weible
P.O. Box 58 18018 Densworth Mews 15000 Washington St., Suite 280
Haymarket, Virginia 20168 Gainesville, Virginia 20155 Haymarket, Virginia 20169

See documents GMAC0221 to GMAC0234 produced in response to Plaintiff's Request for Production of Documents for specific documents, time periods and parties with knowledge.

23. Please describe, in detail, the facts and circumstances concerning your efforts to obtain or review Ms. Wilkes credit report on March 11, 2008, April 1, 2008, November, 12, 2008 and February 11, 2009. Please include in your answer who authorized you to obtain or review Ms. Wilkes credit report. Also, please state your policies and procedures concerning identity theft as required by Federal Law during the aforementioned period of time. Please identify any persons that have knowledge of the same.

Answer

GMAC and Homecomings object to this interrogatory as not reasonably calculated to lead to the discovery of admissible evidence.

Preserving this objection, GMAC and Homecomings state that they cannot verify the alleged inquiries but that any credit inquiries made would have been permissible under the Fair Credit Reporting Act and pursuant to the Plaintiff's authorization. See documents GMAC0096, GMAC0102 and GMAC0110 produced in response to Plaintiff's Request for Production of Documents.

GMAC and Homecomings comply with the Privacy Policy Disclosure (see document GMAC0104 produced in response to Plaintiff's Request for Production of Documents), and they follow the procedures and comply with the Fair and Accurate Credit Transactions Act when investigating any claim of identity theft. See documents GMAC0235 to GMAC0237 produced in response to Plaintiff's Request for Production of Documents.

Plaintiff, GMAC and/or Homecomings have such knowledge.

		(Company)
	Ву:	(Signature)(Name)(Title)
State of		arepsilon
On this day of before the undersigned Notary Pub affirmed that the foregoing Answe knowledge and belief and/or based	, 2009, elic, and on behalf of rs to Interrogatories are true upon the information provi	personally appeared and correct to the best of his/her ded to him/her.
	Notary Public	
My Commission Expires:		

NOLAN, MROZ & McCORMICK 130 Park St., S.E., Suite 200 Vienna, VA 22180 (703) 281-2600 - telephone (703) 281-6238 - facsimile

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Certificate of Service

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